

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**REVISED RESPONSES OF POSTAL SERVICE WITNESS MARTIN TO QUESTIONS
5 AND 6 OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 4 [ERRATA]**
(March 19, 2012)

The Postal Service hereby gives notice of the filing of errata to Postal Service Witness Martin's responses to Questions 5 and 6 of Presiding Officer's Information Request No. 4 (POIR No. 4). Responses to Questions 5 and 6 were filed on February 21, 2012. The attachment to these responses, labeled "AttPOIR4.Wght.Avg.PTP.PTPO (Martin)" contained errors that have been revised. For the convenience of the parties, the Postal Service is submitting complete copies of the responses to Questions 5 and 6 of POIR No. 4, however, only the spreadsheet attachment, labeled "Rev.Att.POIR4.Wght.Avg (Martin)," has been revised. The revisions are highlighted in grey in the spreadsheet.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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5. Please refer to the Responses of the United States Postal Service to Questions 2(b), 9, 10, 12 and 15(l) of Presiding Officer's Information Request No. 1.
- a. Please refer to the response to question 9(b).
 - i. Please provide a description of the methodology for obtaining the 30.5 percent weighted average reduction in plant-to-plant transportation capacity and a copy of the spreadsheet or program where the calculation is performed, including all supporting details used.
 - ii. Please reconcile the difference in the total number of "potential trips eliminated" for the Eastern Area provided in the response to question 9(b), with the number provided in LR-USPS-N2012-1/1,1 Excel file "Transportation Spreadsheets LR," worksheet 'Plant to Plant Summary.'
 - b. Please refer to the response to question 10. Please provide all plant-to-plant surface transportation trips, and all information for each trip in the same table format as Excel file "Attach.Resp. POIR1.Q10," worksheet 'plant to plant Trips'.

RESPONSE:

- (a) Please see the responses below.
- (i) The methodology used for determining which plant-to-plant trips could be eliminated from the rationalized network is provided in my testimony (USPS-T-6, at 9) and in my response to interrogatory GCA/USPS-T6-1. Because the number of trips in the transportation network varies by area, I calculated the weighted average by area. Please see the calculations in the spreadsheet attached to this response, labeled "AttPOIR4.Wght.Avg.PTP.PTPO (Martin).xls".
 - (ii) The table "Plant-to-Plant Summary" in USPS-LR-2012-1/11 and the table provided in response to Question 9 of the Presiding Officer's Information Request No. 1 contain typographical errors. The tables should show that the number of potential trips that could be

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RESPONSE TO QUESTION 5 (CONT.):

eliminated from the Eastern Area is 143. The Postal Service will file appropriate errata to my testimony and to any response to an interrogatory or question from the Presiding Officer that is impacted by the typographical errors.

- (b) Library Reference USPS-LR-N2012-1/11 includes a spreadsheet titled "Plant to Plant Trips" which contains the following information for 322 routes and each of the 1723 trips that comprise those routes: area, HCR id. no., trip no., annual frequency of the trip, origin, locations of the stops on the trip, destination, trip miles, trip purpose (expressed in terms of the mail class transported on the trip), and the utilization percentage of the trip. This information was compiled by reviewing each Highway Contract Route schedule and manually inputting the relevant data from those schedules into an Excel spreadsheet. (Each schedule contains one route.) The routes reflected in the spreadsheet represent a subset of the routes that currently comprise the transportation network.

In response to Question 10 of Presiding Officer's Information Request No. 1 (POIR No. 1), dated December 29, 2011, I provided the following additional information for each route included in the Plant to Plant Trips spreadsheet: annual cost and an indicator as to whether the trip was a "candidate for elimination." To produce this response, I had to manually input the requested data for the trips that were included in the Library Reference. The work product was provided in a file attached to

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RESPONSE TO QUESTION 5 (CONT.):

the response, labeled "Attach.Resp. POIR1.Q10.xls." Currently, there are approximately 1,550 plant-to-plant routes in the transportation network. Providing all of the information sought by this question would entail an analysis of many thousands of trips.

Additionally, Question 5(b) presupposes (inaccurately) that each surface transportation trip that will form part of the rationalized network has been identified by the Postal Service. Currently, the Postal Service is conducting Area Mail Processing ("AMP") consolidation reviews on selected mail processing facilities. See USPS-T-6, at 5. Each AMP review will include an evaluation of the available transportation between the gaining and losing facility, how such transportation should be adjusted, and any consequent increases or decreases in transportation costs. Until postal management issues a final decision to consolidate a specific facility, any study that has been generated as part of a consolidation review is subject to review, reevaluation, modification, and possibly withdrawal. Because the Postal Service has not made final decisions with respect to the vast majority of AMP reviews associated with this docket, and because the design of the transportation network (including the plant-to-plant portion of the network) is dependent upon the outcome of such final decisions, it not possible to provide a response to Question 5(b) that is both complete and final at this time.

To provide as much of the requested information in the most

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RESPONSE TO QUESTION 5 (CONT.):

expeditious manner possible, I obtained data from the Transportation Contracting Support System ("TCSS"). This enabled me to produce a spreadsheet that is similar to the one I filed in response to Question 10 of POIR No. 1. The spreadsheet is contained in Library Reference USPS-LR-N2012-1/65 and is labeled "Resp.POIR4.Q5b (Martin)". The spreadsheet is different from the one filed in response to Question 10 because the information on trip stops is presented vertically rather than horizontally. For example, for HCR Id. No. 22611, Trip "10" is listed three times. This means that this specific trip has three stops (including its destination).

Additionally, the spreadsheet does not indicate the purpose and utilization of the trip or whether the trip is a candidate for elimination because those data do not reside in the TCSS database. The Postal Service anticipates that all final decisions concerning the AMP reviews associated with this docket will be announced by postal management in mid to late February, 2012. The Postal Service will update the record with information indicating the purpose and utilization of the trip and whether the trip is a candidate for elimination within a reasonable time after those announcements.

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6. Please refer to the Response of the United States Postal Service Witness Martin to question 11 of Presiding Officer's Information Request No. 1.
 - a. Please provide a description of the methodology for obtaining the 14.32 percent weighted average reduction in operating miles of plant-to-post office transportation and a copy of the spreadsheet or program where the calculation is performed, including all supporting details used.
 - b. Please provide all current and proposed plant-to-post office routes and trips for all Areas in table format. For each route and/or trip, please include Area, origin post office/facility, destination post office/facility, stops, current mileage, current trip frequency, current cost, proposed mileage, proposed trip frequency, and proposed cost.

RESPONSE:

- (a) To estimate the percentage reduction in plant-to-Post Office operating miles I analyzed the transportation portions of the fourteen (14) AMP studies contained in library references USPS-LR-N2012-1/27 and USPS-LR-N2012-1/NP8. I added the current operating miles in the gaining and losing facilities to get the total current operating miles. I then added the proposed operating miles in the gaining and losing facilities to get the total proposed operating miles. Finally, I subtracted the current operating miles from the proposed operating miles to determine the reduction in operating miles for that AMP. Please see the calculations in the spreadsheet attached to this response, labeled "AttPOIR4.Wght.Avg.PTP.PTPO (Martin).xls".
- (b) For the reasons discussed in my response to Question 5(b) of Presiding Officer's Information Request No. 4 (POIR No. 4), I am unable to provide information on the proposed mileage, proposed trip frequency, and proposed cost of routes in the rationalized network at this time. The

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RESPONSE TO QUESTION 6 (CONT.):

Postal Service will update the record with this information within a reasonable time after the final AMP decisions discussed in my response to Question 5(b) are announced. The responsive information for all plant-to-Post Office routes in the current network is provided in a spreadsheet labeled "Resp.POIR4.Q6b (Martin).xls" which is contained in Library Reference USPS-LR-N2012-1/65.